

1 Jeffrey H. Howard (*pro hac vice*)
2 Jerome A. Murphy (*pro hac vice*)
CROWELL & MORING LLP
3 1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
4 Telephone: 202-624-2500
Facsimile: 202-628-5116
5 Email: jhoward@crowell.com
jmurphy@crowell.com

6 Jason C. Murray (CA Bar No. 169806)
7 Joshua C. Stokes (CA Bar No. 220214)
Nathanial J. Wood (CA Bar No. 223547)
CROWELL & MORING LLP
8 515 South Flower St., 40th Floor
Los Angeles, CA 90071
9 Telephone: 213-622-4750
Facsimile: 213-622-2690
10 Email: jmurray@crowell.com
 jstokes@crowell.com

11 Counsel for Plaintiff Motorola Mobility, Inc.
12 [Additional counsel listed on signature page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Master Docket No. 07-m-1827 SI

19 || This Document Relates To:

20 *Motorola Mobility, Inc. v. AU Optronics Corporation, et al., C 09-5840 SI*

**STIPULATION AND [PROPOSED]
ORDER FURTHER EXTENDING
PLAINTIFF'S TIME TO MOVE TO
COMPEL AS TO CERTAIN
DISCOVERY**

1 Defendants Chi Mei Corp., Chimei Innolux Corp. (“Chimei Innolux”); Chi Mei
 2 Optoelectronics Corp. USA, Inc.; CMO Japan Co. Ltd.; Nexgen Mediatech, Inc.; Nexgen
 3 Mediatech USA, Inc. (collectively, “Chi Mei”) and Plaintiff Motorola Mobility, Inc. (“Motorola”)
 4 stipulate as follows:

5 WHEREAS Motorola served a set of Requests for Production of Documents on Chimei
 6 Innolux on November 4, 2011 (the “Discovery”);

7 WHEREAS Chimei Innolux provided objections to the Discovery on December 8, 2011;

8 WHEREAS the parties have met and conferred regarding Chimei Innolux’s Objections to
 9 the Discovery;

10 WHEREAS Chimei Innolux has agreed to conduct a reasonable search for, and to
 11 produce, certain categories of documents and communications and other documents for certain
 12 custodians pursuant to agreement of the parties;

13 WHEREAS Chimei Innolux previously agreed to permit Motorola additional time to
 14 move to compel further responses to the Discovery and the Court has entered Orders extending
 15 the motion to compel deadline to April 13, 2012;

16 WHEREAS Chi Mei will require additional time to complete its search and document
 17 production and has agreed to provide Motorola additional time to move to compel to enforce the
 18 parties’ agreement with respect to the Discovery.

19 THEREFORE, Chi Mei and Motorola, by their respective undersigned counsel, stipulate
 20 and agree as follows:

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

The deadline for Motorola to move to compel compliance with the parties' agreement regarding the Discovery shall be extended to April 30, 2012.

Dated: April 11, 2012

/s/ Nathaniel J. Wood

Jason C. Murray (CA Bar No. 169806)
Joshua C. Stokes (CA Bar No. 220214)
Nathaniel J. Wood (CA Bar No. 223547)
CROWELL & MORING LLP
515 South Flower St., 40th Floor
Los Angeles, CA 90071
Telephone: 213-622-4750
Facsimile: 213-622-2690
Email: jmurray@crowell.com
jstokes@crowell.com

Jeffrey H. Howard (*pro hac vice*)
Jerome A. Murphy (*pro hac vice*)
CROWELL & MORING LLP
1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Telephone: 202-624-2500
Facsimile: 202-628-5116
Email: jhoward@crowell.com
jmurphy@crowell.com

Kenneth L. Adams (*pro hac vice*)
R. Bruce Holcomb (*pro hac vice*)
Christopher T. Leonardo (*pro hac vice*)
ADAMS HOLCOMB LLP
1875 Eye Street NW
Washington, DC 20006
Telephone: 202-580-8822
Facsimile: 202-580-8821
Email: adams@adamsholcomb.com
holcomb@adamsholcomb.com
leonardo@adamsholcomb.com

Counsel for Plaintiff Motorola Mobility, Inc.

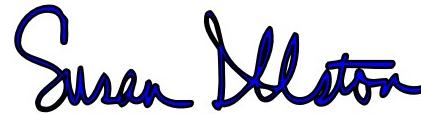
1 /s/ Jason M. Bussey
2
3
4
5
6
7

James G. Kreissman (SBN 206740)
Harrison J. Frahn IV (SBN 206822)
Jason M. Bussey (SBN 227185)
SIMPSON THACHER & BARTLETT LLP
2550 Hanover Street
Palo Alto, California 94304
jkreissman@stblaw.com
hfrahn@stblaw.com
jbussey@stblaw.com

8 *Attorney for Defendants Chi Mei Corporation, Chimei
9 Innolux Corporation, Chi Mei Optoelectronics USA,
10 Inc., CMO Japan Co., Ltd, Nexgen Mediatech, Inc. and
11 Nexgen Mediatech USA, Inc.*

12 **IT IS SO ORDERED.**

13 Dated: 4/17, 2012

14 
15

16 Hon. Susan Illston, United States District Judge

17 DCACTIVE-18092013.1

28